

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

RAY A. FOX, by and through his
Guardian ROSE FOX,

Plaintiff,

V.

DR. P. GHOSH, et al.,

Defendants.

No.09 C 5453

Judge Holderman
Magistrate Judge Brown

**DEFENDANTS WEXFORD HEALTH SOURCES, INC.,
DR. CONSTANTINE PETERS, AND JAMES BECKER, RN'S
RESPONSE TO PLAINTIFF'S MOTION IN LIMINE #9**

Defendants, WEXFORD HEALTH SOURCES, INC., DR. CONSTANTINE
PETERS, and JAMES BECKER, RN, by their attorneys, CHARYSH & SCHROEDER,
LTD., for their response to plaintiff's motion *in limine* #9 state:

1. In plaintiff's motion *in limine* #9, he seeks to bar defense counsel from arguing or suggesting the plaintiff's expert witness, Mila Carlson, "has violated criminal laws or is a criminal."
2. The defendants have no intention of arguing Ms. Carlson is a criminal or has committed any crimes. However, because Ms. Carlson's qualifications and credentials are at issue in this case, the defendants may seek to elicit testimony on cross-examination regarding the validity of her doctorate degree, including the fact that she is prohibited by law from referring to herself as a "doctor" or "Ph.D." in certain states.
3. Ms. Carlson is the plaintiff's life-planning expert. (See deposition transcript, attached as **Exhibit A**). She maintains a website to advertise her legal

consulting services, where she identifies herself as “Dr. Mila Carlson.” (**Exhibit B**). The website can be viewed in all 50 states and its purpose is to generate business for her legal consulting services. (Ex. A, p. 11).

4. Ms. Carlson's “doctorate degree” is from Warren National University, a defunct, internet diploma-mill. (**Exhibit C**). Warren-National has never been accredited by any educational accreditation body. (Ex. A, p. 18). Her “doctoral” study consisted of taking six courses on the internet over a one-year period. (Ex. A, pp. 20-22).

5. A degree from Warren National is so specious that it is illegal in some jurisdictions to identify yourself as a “doctor” or “Ph.D.” with such credentials. Ms. Carlson admitted it is illegal to identify herself as a Ph.D. in the states of Texas and Oregon. (Ex. A, p. 25; see also **Exhibit D**). In Oregon, she is legally required to identify her degree as “unaccredited.” (Ex. A, p. 25). She does not do so on her website. It is also illegal to advertise her degree in the state of Texas. (Ex. A, pp. 28-32; see also **Exhibit E**, showing it is illegal to use Warren National degrees in the state of Texas (listed under its prior name of “Kennedy-Western University)). Ms. Carlson admits she may be violating state statutes by advertising her services. (Ex. A, p. 33) (see also statement from U.S. Dept. of Education warning consumers that, “in some states, it can be illegal to use a degree from an institution that is not accredited by a nationally recognized accrediting agency,” attached as **Exhibit F**). Here, it is undisputed that Warren National was unaccredited.

6. The defendants anticipate cross-examining Ms. Carlson on her expert qualifications, including the areas identified above. The qualifications of an expert witness

are appropriate areas for cross-examination to establish the validity of the witness' opinions.

Liquid Air Corp. v. Rogers, 834 F.2d 1297, 1308 (7th Cir. 1987). The defendants will not suggest Ms. Carlson is a "criminal" or has committed any "crimes."

WHEREFORE, defendants, WEXFORD HEALTH SOURCES, INC., DR.

CONSTANTINE PETERS, AND JAMES BECKER, RN, respectfully request this

Honorable Court deny plaintiff's motion *in limine* #9, in part, and grant such further relief as the Court deems just and proper.

CHARYSH & SCHROEDER, LTD.

s/Richard A. Tjepkema

CHARYSH & SCHROEDER, LTD.

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Michael J. Charysh (ARDC# 6187455)

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Mila Carlson, RN, Ph.D.

November 9, 2011

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IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

RAY A. FOX, by and)
through his Guardian,)
ROSE FOX,)
Plaintiff,)
-vs-) Case No. 09 C 5453
DR. CONSTANTINE PETERS,) Judge Holderman
et al.,) Magistrate Judge
Defendants.) Brown

The deposition of MILA CARLSON, RN, Ph.D., called for examination, taken pursuant to the Federal Rules of Civil Procedure of the United States District Courts pertaining to the taking of depositions, taken before KATHLEEN A. MARTHALER, CSR No. 84-4036, a Notary Public within and for the County of Cook, State of Illinois, and a Certified Shorthand Reporter of said state, at Suite 1300, 33 North Dearborn Street, Chicago, Illinois, on the 9th day of November, A.D., 2011, commencing at 1:00 p.m.

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1 PRESENT:

2 LOEVY & LOEVY,

3 (312 North May, Suite 100,

4 Chicago, Illinois 60607,

5 (312) 243-5900), by:

6 MS. KATIE HILL,

7 appeared on behalf of the Plaintiff;

8
9 CHARYSH & SCHROEDER, LTD.,

10 (33 North Dearborn Street, Suite 1300,

11 Chicago, Illinois 60602,

12 (312) 372-0222), by:

13 MR. MICHAEL J. CHARYSH,

14 appeared on behalf of Certain Defendants;

15
16 OFFICE OF THE ATTORNEY GENERAL,

17 (100 West Randolph Street,

18 Chicago, Illinois 60601,

19 312-814-4416), by:

20 MR. CHRISTOPHER E. WALTER,

21 appeared on behalf of

22 Certain State Defendants.

23 REPORTED BY: KATHLEEN A. MARTHALER, CSR

24 CSR No. 84-4036.

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1 WHEREUPON, the witness was duly
2 sworn.)

3 MILA CARLSON, R.N., Ph.D.,
4 called as a witness herein, having been first duly
5 sworn, was examined and testified as follows:

6 EXAMINATION

7 BY MR. CHARYSH:

8 Q. Would you state your full name for the
9 record, please.

10 A. Mila G. Carlson.

11 MR. CHARYSH: Let the record reflect that this
12 is the deposition of Mila G. Carlson taken pursuant
13 to notice and agreement of the parties.

14 This deposition will be taken in
15 accordance with the Federal Rules of Civil Procedure
16 and the Federal Rules of Evidence and local court
17 rules.

18 BY MR. CHARYSH:

19 Q. Ma'am, my name is Mike Charysh, and I
20 represent some of the defendants in this case.

21 You've been deposed before, true?

22 A. Yes.

23 Q. I'm just going to repeat a couple of
24 rules to hopefully make things simpler. Please keep

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1 your voice up so the court reporter can accurately
2 transcribe your testimony.

3 Please answer all of my questions or any
4 other question that's asked today verbally as the
5 court reporter can't take down a nod of the head or
6 any gesture you may make with your body.

7 Most importantly, ma'am, if you do not
8 understand one of my questions, please let me know
9 immediately and I'll be happy to explain it or ask
10 another question.

11 Is all of that understood?

12 A. Yes.

13 Q. I see that sometimes you wear glasses.
14 Are you nearsighted or farsighted?

15 A. Nearsighted now.

16 Q. Do you have any problems with your
17 hearing?

18 A. No.

19 Q. Are you on any medications today that
20 would affect your testimony?

21 A. No.

22 Q. Have you ever been convicted of a crime
23 other than a minor traffic offense?

24 A. No.

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1 I ran off of the website for the NAPW, the National
2 Association for Professional Women, on November 8th,
3 2011, and my question is: Have you ever seen this
4 before?

5 A. It looks like the profile I set up when I
6 signed up for that association.

7 Q. Okay. So you approved this and its text,
8 true?

9 A. That would be yes.

10 Q. And the purpose of having this on the
11 internet is that it goes to all fifty states so
12 people can see your qualifications and the services
13 that you provide and decide whether or not to retain
14 you, true?

15 A. That would be one reason.

16 Q. Okay. What would other reasons be?

17 A. Networking for professional women.

18 Q. For the purpose of generating business as
19 a life planner among other things?

20 A. Among other things, yes.

21 Q. And also under your education, it states
22 that you have a doctorate from Warren National
23 University, formerly Kennedy Western University,
24 true?

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1 A. Yes.

2 (WHEREUPON, a certain document was
3 marked Carlson Deposition Exhibit
4 No. 4, for identification, as of
5 11/09/2011.)

6 BY MR. CHARYSH:

7 Q. I would like you to take a look at what
8 was marked as Exhibit No. 4, which I downloaded
9 from your website, your company's website, on
10 November 8th, 2011, and I'd ask if you've read this
11 text and approved it?

12 A. Yes.

13 Q. And one of the purposes of having this on
14 your website is to generate work or business as a
15 life planner, true?

16 A. One of the purposes.

17 Q. And this is on the internet. It can be
18 accessed in all fifty states, true?

19 A. Yes.

20 Q. This also shows in the second paragraph
21 from the bottom of the text that you completed your
22 Ph.D. in health administration from Warren National
23 University in Cheyenne, Wyoming, true?

24 A. Yes.

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1 Q. Do you consider Warren to be a credible
2 educational institution?

3 A. For the type of degree that I was
4 searching for, yes.

5 Q. Why is that?

6 A. It allowed me to take the courses,
7 complete the program, write my dissertation without
8 requiring me to be on site out of state.

9 Q. And Warren was originally known as
10 Kennedy Western University, true?

11 A. Yes.

12 Q. It started in California in 1984?

13 A. I don't know that for sure.

14 Q. Well, what background material did you
15 research, if any, before you decided to get your
16 Ph.D. from there?

17 A. I did internet searches and networked with
18 other people about the different kinds of programs
19 for completing a Ph.D.

20 Q. And Warren changed its name in 2007 from
21 Kennedy Western to Warren, true?

22 A. Yes.

23 Q. Warren University never had an actual
24 physical campus, true?

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1 to confirm that they actually had a physical campus
2 in Cheyenne, Wyoming?

3 A. I did find information that led me to
4 believe they did have a location. They also had a
5 graduation ceremony that I was invited to attend
6 prior to their disbanding.

7 Q. And what information was it that led you
8 to that belief?

9 A. A phone conversation with the staff at
10 the Wyoming campus.

11 Q. And who did you talk to and when?

12 A. I couldn't tell you.

13 Q. Do you have anything in writing that
14 confirms any of these inquiries that you made,
15 anything from them or to them?

16 A. I probably have something in my files
17 from years ago, but I don't know for sure.

18 Q. Now, you know today that what they told
19 you about having a campus in Wyoming was untrue,
20 don't you?

21 A. I don't know that for a fact.

22 Q. So as you sit here today, you don't know
23 whether there was an actual campus in Cheyenne,
24 Wyoming?

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1 A. When I talked to the second -- with the
2 state board of education for secondary education,
3 they indicated that they had been on campus, but --

4 Q. Who told you that?

5 A. That was through the State of Wyoming
6 Board of Education. I contacted them about a
7 question that I had. I don't recall the question.

8 Q. And who did you talk to and when did they
9 make that assertion to you?

10 A. That would have been in the -- sometime
11 in 2008 prior to finishing my degree.

12 Q. Who did you talk to?

13 A. I don't know.

14 Q. Do you have anything in writing that
15 would confirm that that conversation occurred?

16 A. I don't know.

17 Q. But someone from that entity told you,
18 yes, they have a campus and, yes, they have
19 classrooms and students just like a regular
20 university?

21 A. That was my understanding from her
22 conversation.

23 Q. Okay. That's not what I asked you. What
24 I asked was: Did they tell you that, that they had

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1 an actual campus with a building, classrooms and
2 students?

3 A. Not in those words, no.

4 Q. Do you remember what words they did use
5 that led to you that belief?

6 A. That they referred to their campus and
7 they were working on their accreditation process.

8 Q. Now, isn't it true that -- strike that.
9 Isn't it true that Warren National has
10 never been accredited by any higher education
11 accreditation body recognized in the United States?

12 A. To my knowledge, that's correct.

13 Q. It no longer operates, true?

14 A. Yes.

15 Q. It made an attempt to become accredited
16 with the North Central Association of Colleges and
17 Schools. Were you aware of that?

18 A. Yes, I knew they were doing that.

19 Q. And the school withdrew its application
20 after their website explained that an evaluation
21 visit by that entity didn't go very well. Were you
22 aware of that?

23 A. Not of that cause, just that it was not
24 going to be accredited.

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1 Q. What was your understanding of why they
2 weren't going to become accredited?

3 A. They didn't want to proceed further with
4 the accreditation process.

5 Q. Did they give a reason?

6 A. I don't recall.

7 Q. Now, Warren National when it existed
8 would give extensive credit toward degree completion
9 for what they called life experience, true?

10 A. I don't recall that.

11 Q. Did you get any credit for life
12 experience toward your Ph.D.?

13 A. I applied with my master's, which was
14 attained from an accredited university, and that was
15 the main credential that I used for my application.

16 Q. My question was: Did they give you any
17 credit for life experience?

18 A. I don't believe that they did.

19 Q. Do you have your transcripts somewhere
20 from Warren?

21 A. I do have them.

22 Q. Do they show credit for life experience?

23 A. I have the official transcript which I
24 haven't opened because it's sealed.

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1 Q. Why haven't you opened it?

2 A. Because once they're opened, they're no
3 longer a legitimate transcript.

4 Q. Well, why are you keeping it?

5 A. For future job applications.

6 Q. So Warren is the type of university that
7 you would put on a job application --

8 A. Yes.

9 Q. -- in your opinion?

10 A. Yes.

11 Q. All of the courses you took were online,
12 true?

13 A. They were not virtual online. I received
14 the materials. I did the study programs and then I
15 sat and had a proctored exam to complete.

16 Q. Okay. How many courses did you take
17 through Warren?

18 A. I took six courses through them.

19 Q. Over the course of three years?

20 A. It was closer to a year, just a little
21 over a year to complete all of the courses.

22 Q. So you took six courses, and after --
23 let's talk about how those courses were
24 administered.

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1 You would get written materials in the
2 mail, true?

3 A. Yes.

4 Q. And then you would read those materials
5 and you would take an open book, multiple choice
6 test for each class?

7 A. No.

8 Q. That's not true?

9 A. No, that's not true.

10 Q. How would you -- well, you wouldn't have
11 to actually attend anything on computer. You would
12 just read the materials, right?

13 A. I would read the books and the syllabus,
14 and once I was comfortable with the material, I
15 would apply to take the exam.

16 And then the exam was sent to a proctor
17 and I sat and they were all essay questions. They
18 were not multiple choice.

19 Q. You never took a multiple choice test
20 with Warren?

21 A. No.

22 Q. How many tests per course?

23 A. One.

24 Q. And that's the entirety of what you did

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1 for each course. You would read materials, apply
2 for a proctored exam and take the exam, true?

3 A. Yes.

4 Q. You didn't have to interact with
5 professors, true?

6 A. I did as the need arose.

7 Q. Okay. How would you do that at Warren?

8 A. I would either send an e-mail to the
9 advisor, to the instructor for the course, or I
10 spoke by phone.

11 Q. Do you have a record of any of these
12 e-mails?

13 A. And I still communicate with my
14 dissertation professor.

15 Q. You wrote a dissertation?

16 A. Yes.

17 Q. What was the title? What was the
18 subject?

19 A. It's on my curriculum vitae.

20 Q. Okay.

21 A. The exact title is "The Adoption Rates
22 and Barriers to Implementation of Electronic Health
23 Records in Physician Office Practices in
24 Northwestern Illinois."

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1 Q. And who was your advisor?

2 A. Dr. Ted Coleman.

3 Q. Where is he located?

4 A. He is the chair of a department at
5 Cal State, San Bernardino.

6 Q. Was the dissertation published?

7 A. Not published, but I did have it
8 registered with the Congress, the Library of
9 Congress.

10 Q. Do you have a copy of it at home?

11 A. At home, yes.

12 Q. In your records?

13 A. Yes.

14 Q. The exams that you took, were they open
15 book?

16 A. No.

17 Q. None of them?

18 A. Not for this course.

19 Q. For any of your courses at Western (sic),
20 were the exams open book?

21 A. No.

22 MS. HILL: You mean Warren?

23 MR. CHARYSH: I'm sorry. Warren.

24 BY THE WITNESS:

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1 A. At Warren, no.

2 BY MR. CHARYSH:

3 Q. How long would the exams be typically?

4 A. They allowed three hours.

5 Q. And where would you take them?

6 A. Swedish American Hospital at one of the
7 satellite locations where the proctor was located.

8 Q. As you sit here today, are you aware of
9 the fact that it's actually a crime in several
10 states to list the fact that you have a degree from
11 Warren if you're trying to disseminate materials in
12 your profession?

13 A. No.

14 (WHEREUPON, a certain document was
15 marked Carlson Deposition Exhibit
16 No. 5, for identification, as of
17 11/09/2011.)

18 BY MR. CHARYSH:

19 Q. Take a look at what we've marked as
20 Exhibit No. 5, which is in the State of Oregon,
21 which I obtained on November 8th of this year.

22 And after you've had a chance to look at
23 it, I'm going to ask you a few questions.

24 (Short pause.)

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1 THE WITNESS: What does the heading on the top
2 say? I can't read it.

3 MR. CHARYSH: That I'm not sure. It was cut
4 off, but it is from www.osac.state.or.us, which has
5 to do with the Oregon Department of Education, I
6 believe.

7 When you're done with the first page,
8 just let me know because that's what we're going to
9 talk about.

10 (Short pause.)

11 BY MR. CHARYSH:

12 Q. Do you see the paragraph where it reads,
13 quote: "In addition, an individual using an
14 unaccredited degree, even if the employer allows use
15 of such degree, must disclose on resumes,
16 letterheads, business cards, announcements and
17 advertisements that," quote, (Insert the name of the
18 school), "does not have an accreditation recognized
19 by the United States Department of Education and has
20 not been approved by the Office of Degree
21 Authorization," closed quote?

22 Do you see what I'm reading from?

23 A. Yes.

24 Q. And then further down, it says: "It is a

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1 Class B Misdemeanor under the Oregon Criminal Code
2 to use a degree in violation of ORS 348.609," which
3 is the statute they're citing above.

4 Do you see what I'm talking about?

5 A. Yes.

6 Q. Anywhere on the materials that you have
7 on the internet, the two websites we talked about,
8 is that representation made?

9 A. No.

10 Q. So I could access those on the internet
11 in the state of Oregon and that representation would
12 not come up, that your degree from Warren is from an
13 unaccredited institution, true?

14 A. Yes.

15 Q. Have you ever done business as a
16 consultant in the state of Oregon?

17 A. No.

18 Q. Have you ever received an inquiry from
19 anyone in the state of Oregon?

20 A. Not that I recall.

21 Q. Do you believe that after reading this,
22 you should make that representation on your website?

23 MS. HILL: Objection.

24 Do you have a copy of the statute?

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1 MR. CHARYSH: Not with me, no.

2 The citation is there, and it's cited in
3 the text which is written there.

4 MS. HILL: Right, but you're asking whether
5 she's -- if it's applying to the law that she's only
6 read. I mean, there's a representation about the
7 statute, but --

8 MR. CHARYSH: Sure.

9 We're all presumed to know the law.

10 BY MR. CHARYSH:

11 Q. Now, if you look at the list of schools
12 that they list in this exhibit as being unaccredited
13 and subject to this, on Page 15 of 16, it lists
14 Warren National University, true?

15 A. Yes.

16 Q. And it shows it's in Wyoming, true?

17 A. Yes.

18 Q. And then it says: "New name for Kennedy
19 Western University," true?

20 A. Yes.

21 Q. So that refers to the Warren National you
22 attended, true?

23 A. Yes.

24 Q. After reading this, do you think that you

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1 should put a disclaimer on your website about your
2 Ph.D.?

3 A. I would have to do more research.

4 Q. All right. So you don't know right now,
5 true?

6 A. True.

7 MR. CHARYSH: I'll mark this as the next one.

8 (WHEREUPON, a certain document was
9 marked Carlson Deposition Exhibit
10 No. 6, for identification, as of
11 11/09/2011.)

12 MR. CHARYSH: Why don't you read the first
13 page, and after you've had a chance to look at it,
14 I'm going to ask you some questions.

15 (Short pause.)

16 MR. CHARYSH: Are you ready?

17 THE WITNESS: Yes.

18 BY MR. CHARYSH:

19 Q. Okay. Now, this was obtained from the
20 Texas Higher Education Coordinating Board off of
21 their website on November 8th, 2011, and this
22 section is entitled: "Institutions Whose Degrees
23 are Illegal to Use in Texas."

24 Do you see what I'm referring to?

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1 A. Yes.

2 Q. Have you ever been hired as a consultant
3 in Texas?

4 A. No.

5 Q. Have you ever had an inquiry from someone
6 seeking to hire you calling from Texas?

7 A. Not that I recall, no.

8 Q. And the two websites that we referenced
9 earlier, you can access those from the state of
10 Texas, can't you?

11 A. Yes.

12 Q. Now, in the first paragraph of Page 1, it
13 tells us: "The Texas Higher Education Coordinating
14 Board annually reviews the institutions included on
15 this list."

16 Do you see what I'm referring to?

17 A. Which?

18 Q. The end of the first paragraph under
19 "Institutions Whose Degrees are Illegal to Use in
20 Texas."

21 A. Yes.

22 Q. Then under that, it says: "A fraudulent
23 or substandard degree means a degree conferred in
24 Texas in violation of the Texas Education Code;

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1 conferred at another state in violation of that
2 state's laws; conferred in another state by an
3 institution that was not accredited by an accreditor
4 recognized by the Coordinating Board and that has
5 not been approved by the Coordinating Board for its
6 degrees to be used in Texas; or conferred outside
7 the United States by an institution that the
8 Coordinating Board determines is not the equivalent
9 of an accredited or authorized degree."

10 Do you see what I'm referring to?

11 A. Yes.

12 Q. And under that, it says: "Under the
13 Texas Penal Code, Section 32.52 prohibits the use of
14 fraudulent or substandard degrees," quote, "in a
15 written or oral advertisement or other promotion of
16 a business with the intent to obtain employment;
17 obtain a license or certificate to practice a trade,
18 profession or occupation; obtain a promotion, a
19 compensation or other benefit or an increase in
20 compensation or other benefit in employment or in
21 practice of a trade, profession or occupation;
22 obtain admission to an educational program in the
23 state or gain a position in government with
24 authority over another person regardless of whether

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1 the actor receives compensation for the position."

2 Do you see what I'm referring to?

3 A. Yes.

4 Q. And immediately after that, it says:
5 "Violation of this law is a Class B Misdemeanor."

6 Do you see what I'm referring to?

7 A. Yes.

8 Q. Now, if I look at the next twenty pages,
9 it lists various institutions to which they're
10 referring whose degrees are illegal to use in Texas,
11 true?

12 That's my only question. There's a long
13 list of institutions that they're referring to,
14 true?

15 A. Yes.

16 Q. They say their degrees are illegal to use
17 in Texas for the purposes listed under that section
18 of the Texas Penal Code, true?

19 A. Well, the comment just says "no
20 accreditation and no degree granting."

21 Q. But you understand that what they're
22 doing is they're giving you a list of places they're
23 saying are in violation of that statute, true?

24 A. That would be my understanding, yes.

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1 Q. And if I go to Page 10 of 20, it appears
2 that sixth from the top I find Kennedy Western
3 University, true?

4 A. Yes.

5 Q. It's listed as being in California and
6 Wyoming, true?

7 A. Yes.

8 Q. And then the comment is: "No
9 accreditation from a CB recognized accreditor. Name
10 changing to Warren National University," true?

11 A. Yes.

12 Q. Now, that's the same Warren that you
13 attended, true?

14 A. Yes.

15 Q. After reading this, are you concerned
16 that the two websites that we've talked about
17 might be in violation of the Texas Penal Code,
18 Section 32.52?

19 A. Not knowing the law, I would refer that
20 back to my legal counsel.

21 Q. So you don't think that by disseminating
22 through the internet via those two websites and
23 their claim that you have a Ph.D. from this
24 institution, you might be violating this Texas

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1 statute that prohibits the use of degrees from
2 unaccredited institutions for various purposes?

3 MS. HILL: Asked and answered.

4 MR. CHARYSH: Go ahead.

5 THE WITNESS: Can you explain the question?
6 I'm sorry.

7 MR. CHARYSH: Sure.

8 Read it, please.

9 (WHEREUPON, the record was read
10 as requested.)

11 BY THE WITNESS:

12 A. And I would refer that back to my legal
13 counsel.

14 BY MR. CHARYSH:

15 Q. But that's not my question. My question
16 is: After reading this, knowing that on two
17 websites you've described a Ph.D. from Warren, does
18 that cause you any concern that you might be
19 violating this law in Texas if someone accesses
20 those websites in Texas?

21 A. That could be, which is why I want to
22 talk to my legal counsel.

23 Q. Okay. Have you ever heard Warren
24 referred to as a diploma mill?

Mila Carlson, RN, Ph.D.

November 9, 2011

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1 A. No.

2 Q. Do you know that they were investigated
3 by the United States Congress?

4 A. No.

5 Q. Have you ever read any testimony by
6 people who attended Warren in front of Congress?

7 A. No.

8 Q. Do you know that there was litigation
9 against Warren because people could not get jobs
10 with their degrees?

11 A. No.

12 Q. Were you ever made aware of any of that
13 litigation?

14 A. No.

15 Q. Do you ever introduce yourself as doctor?

16 A. Yes.

17 Q. So you've gone to professional meetings
18 on various occasions and introduced yourself as
19 Dr. Carlson, true?

20 A. Yes.

21 Q. Do you think that that's a fair and
22 accurate representation if your Ph.D. is from a
23 place like Warren?

24 A. Yes, I did the work.

Mila Carlson, RN, Ph.D.

November 9, 2011

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1 Q. But do you think that they've given you a
2 legitimate doctoral degree?

3 A. Yes.

4 Q. And the basis for that -- strike that.

5 And you believe that even though they're
6 unaccredited or were never accredited by any
7 legitimate institution, true?

8 A. Yes.

9 Q. And you believe that even though you only
10 had to take six courses online to get that degree,
11 true?

12 A. Yes.

13 Q. Do you know of any recognized accredited
14 academic institution that would give you a Ph.D.
15 after having taken only six courses and never having
16 to go into a classroom?

17 A. I don't know enough about the other
18 universities and how they operate to do that, and I
19 didn't get a degree given to me. I did the work and
20 I earned the degree.

21 Q. Okay. But what I'm saying is: If I
22 wanted to get a doctoral degree from Northwestern,
23 do you believe that they would give it to me after
24 six classes that I never had to actually go to and



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Biography of Dr. Mila G. Carlson

Dr. Mila G. Carlson is the Founder and President of Mila Carlson & Associates, P.C., Legal Nurse Consulting/Life Care Planning, based in Rockford, IL. Mila's background is in medical/surgical nursing, enterprise patient scheduling, and healthcare administration. She is a member of the National Alliance of Certified Legal Nurse Consultants, American Association of Nurse Life Care Planners, and the National Association of Professional Women.

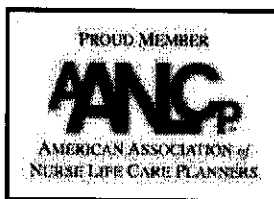
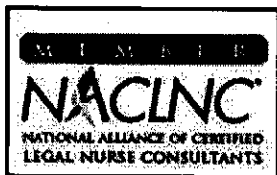
Mila Carlson & Associates will assist defense or plaintiff attorneys with any medical-related case, such as medical malpractice, personal injury, criminal or family law. Screening cases for merit, reviewing hospital policies and procedures, locating testifying experts, conducting authoritative research, writing brief or comprehensive reports are some of the many services Mila can provide. Life Care Planning services include preparing life care plans or medical cost projections, providing expert witness testimony, and case management.

A graduate of SwedishAmerican Hospital School of Nursing, Rockford, IL, Mila began her nursing career working on a medical/surgical unit and continued there for 13 years. During that time she served as charge nurse on a rotating basis. When the opportunity to transfer to a supervisory position became available, Mila accepted the position. Her main role was to establish an enterprise-wide centralized patient scheduling department, assist in the development of scheduling software, and supervise the scheduling staff.

Her background in enterprise-wide scheduling software opened new opportunities for Mila to accept a position with McKesson Provider Technologies, a Fortune 500 company. During her tenure there she served in various roles, including enterprise scheduling consultant, product specialist, senior account manager and senior account specialist. Working with customers across the country provided Mila with the opportunity to develop ongoing client relationships and educate customers on the use and benefits of the software products. In her tenure with McKesson, Mila worked with third party vendors and many business units within the company.

While working full time with McKesson, Mila pursued her educational career. She completed her Bachelor of Science in Health Arts and Masters of Science in Health Services Administration from the University of St. Francis, Joliet, IL. She then completed her PhD in Health Administration from Warren National University, Cheyenne, WY. Mila completed her legal nurse consulting course and certification examination through the Vickie Milazzo Institute. She completed her Life Care Planning course through Kelynco.

Mila serves as adjunct faculty for the University of St. Francis. She is also a member on the Board of Directors for Vibrant Living Communities, a faith-based continuum of care retirement community. She has chaired and served on various committees in her local church. Volunteer activities included Girl Scout leader, PTO officer, and booster club member. She is a Rockford Register Star Young American recipient and was chosen as Winnebago County 4-H Outstanding Alumni.



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February 2, 2009

Warren National U., Formerly Known as Kennedy-Western U., to Shut Down

Warren National University will be no more at the end of March, seven months after it suspended new admissions.

In a lengthy, convoluted explanation on its Web site, the university blamed the decision to close its doors on a failed accreditation bid and the general economic downturn.

The institution, known as Kennedy-Western University before a 2007 name change, has been around since the 1980s. It was founded in California but ran afoul of the state's licensing board. It later settled in Wyoming.

In 2004 the General Accounting Office investigated Kennedy-Western and a number of other degree-granting entities that it deemed questionable. The GAO was concerned because federal employees were getting reimbursed by the government for their tuition.

The university was notable for its slick marketing and for doling out credit for "life experience." It often hired professors from accredited universities to teach classes on the side. Its founder, Paul Saltman, always resisted the diploma-mill label and, in a letter to The Chronicle in 2004, touted the university's "academic rigor." —*Thomas Bartlett*

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Wednesday, February 09, 2005 - Page updated at 12:00 A.M.

Alleged "diploma mills" flocking to Wyoming

By Mead Gruver
The Associated Press

CHEYENNE, Wyo. — The campus of American Capital University has no tree-shaded quadrangle, no stately old buildings or libraries, no classrooms, no fraternity houses — not even a student curled up with a book in a quiet corner.

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There's just a middle-age man who sits at a computer in a tiny, undecorated, windowless office in the basement of a downtown building.

But in a sense, this fellow — Bill Allen, American Capital University's chief academic officer — has lots of company: Wyoming licenses 10 other online schools that are not accredited by any mainstream organization and maintain only a token physical presence in the state.

Defenders of such schools say Wyoming is forward-thinking for accepting a relatively inexpensive way for working adults to get degrees in their spare time through mail and Internet courses. But others say the state has become a haven for diploma mills.

"People start to giggle if you say 'Wyoming-licensed school,' if you know about accreditation," said George Gollin, a University of Illinois physics professor and crusader against diploma mills, schools that offer degrees for little or no academic work.

Because of loose state requirements, more online schools are popping up in Wyoming than anywhere else, said Steven Crow, executive director of the North Central Association of Colleges and Schools, the regional school-accreditation agency.

"Most other states have enough rigor in how they determine who can operate as a college and grant degrees that it's not as easy for places to get started," he said.

Cheyenne alone is home to six distance-learning schools. A typical example is Paramount University of Technology, with a couple of basement offices in a downtown mall. Nearby, American City University occupies a couple of rooms in a building that once housed a brothel.

Another school, Kennedy-Western University, was the focus of a U.S. Senate Governmental Affairs Committee investigation last year. At the school, only an open-book, multiple-choice test with 100 questions was required in a course on hazardous-waste management; the same with environmental law and regulatory compliance.

"With just 16 hours of study, I had completed 40 percent of the course requirements for a master's degree," said Claudia Gelzer, a committee staffer.

Kennedy-Western spokesman David Gering said the committee did not invite the school to defend itself and did not note that Kennedy-Western requires final papers, theses and dissertations of 100 to 200 pages. Moreover, 80 percent of Kennedy-Western's professors hold doctorates from accredited universities, while the rest have master's degrees from accredited schools, he said.

Wyoming's private-school licensing laws say all faculty members must have a

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The Seattle Times: Education: Alleged "diploma mills" flocking to Wyoming
bachelors degree from an accredited school and at least half must have at
least a master's degree from an accredited school. The schools must maintain
an office in the state, pay a \$10,000 licensing fee and post a \$100,000
performance bond.

In December, state lawmakers abandoned a bill that would have required
private schools to be accredited by 2010.

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From the Portland Business Journal:

<http://www.bizjournals.com/portland/stories/2004/12/20/daily26.html>

Oregon settles with unaccredited university

Portland Business Journal

Date: Wednesday, December 22, 2004, 8:14am PST

Related:

Legal Services

The state of Oregon has settled a lawsuit with a California-based university that involved how the state treats degrees from unaccredited institutions.

Oregon Attorney General Hardy Myers and Kennedy-Western University President Paul Saltman reached an out-of-court settlement of the university's federal district court lawsuit against Myers and Alan Contreras, administrator of the Oregon Student Assistance Commission's Office of Degree Authorization.

KWU, based in Agoura, Calif., filed suit in July 2004 on behalf of three Oregon graduates to challenge a state law that makes it unlawful for a person to represent that he or she has a degree if that degree was granted by an unaccredited university. The lawsuit claimed that the Oregon law violated KWU graduates' constitutional rights by unreasonably restricting their ability to use a lawfully obtained academic credential. Under the settlement agreement, Myers and Contreras agreed that the state would not enforce this statute as long as KWU degree holders disclose their school's nonaccredited status when representing their academic achievement.

The settlement does not require any Oregon employer to accept unaccredited degrees as valid credentials or change the requirements for state employment, professional licensure, college admission or other areas for which a degree from an accredited school is required. Degree holders who fail to disclose that their degrees are from unaccredited schools are still subject to civil and criminal penalties.

In addition, the settlement agreement provides that the Oregon Office of Degree Authorization and Attorney General Myers will make an effort to secure an amendment of the statute during the state's next legislative session that would decriminalize the use of a nonaccredited degree as long as degree holders disclose their schools' nonaccredited status when stating their credentials for business or professional purposes.

According to the terms of the settlement agreement, all issues in the lawsuit will be resolved, and the lawsuit will be dismissed, once the contemplated legislation is passed. If the legislation

is not enacted by the end of the 2007 legislative session, the lawsuit will move forward.

Oregon officials are also obligated under the settlement agreement to refrain from characterizing KWU as a "diploma mill." The attorney general's office also agreed to provide ODA personnel with a training session on defamation law.

KWU says it is authorized by the state of Wyoming to offer academic degrees at the bachelor's, master's and doctoral level. The school says it delivers its programs through a combination of online learning and directed study.

Texas Higher Education Coordinating Board



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Institutions Whose Degrees are Illegal to Use in Texas

Consonant with its responsibilities under Chapter 61 of the Texas Education Code and rules promulgated pursuant thereto, the Texas Higher Education Coordinating Board annually reviews the institutions included on this list.

"Fraudulent or substandard degree" means a degree conferred in Texas in violation of the Texas Education Code; conferred in another state in violation of that state's laws; conferred in another state by an institution that was not accredited by an accreditor recognized by the Coordinating Board and that has not been approved by the Coordinating Board for its degrees to be used in Texas; or conferred outside the United States by an institution that the Coordinating Board determines is not the equivalent of an accredited or authorized degree. (Texas Educational Code, Chapter 61, Section 61.302)

The Texas Penal Code (Section 32.52) prohibits the use of fraudulent or substandard degrees "in a written or oral advertisement or other promotion of a business; or with the intent to: obtain employment; obtain a license or certificate to practice a trade, profession, or occupation; obtain a promotion, a compensation or other benefit, or an increase in compensation or other benefit, in employment or in the practice of a trade, profession, or occupation; obtain admission to an educational program in this state; or gain a position in government with authority over another person, regardless of whether the actor receives compensation for the position." Violation of this law is a Class B misdemeanor.

Name	Location	Remarks
Abba Institute	Uvalde, San Antonio, Texas	No degree-granting authority from the CB & no accreditation from a CB recognized accreditor. In 1998, awarded Doctor of naturopathy degrees.
Académie Européene d'Informatisation World Information Distributed University	Belgium	The Belgian government has referred to the entity as a diploma mill and has confirmed that this entity has no authority to issue degrees. It appears to be linked with a similar entity in Russia.
Academy for Contemporary Research		No accreditation from a CB recognized accreditor.
Academy of Healing Arts		No accreditation from a CB recognized accreditor.
Academy of Natural Therapies	Hawaii; California; Wyoming; Montana	No accreditation from a CB recognized accreditor. Closed by court order in Hawaii on 3/19/2003. Relocated to CA, then to either WY or MT.
Academy of Religious & Spiritual Studies		No accreditation from a CB recognized accreditor.
Adam Smith University	Liberia; Saipan	No degree-granting authority from Liberia or Saipan.
Adams and Washington University, King College of Professional Studies	England	No degree-granting authority from the United Kingdom.
Addison State University	Ontario	No degree-granting authority from Ontario. Not a state-supported university as implied by the name.
Adjunct College	Canyon, Texas	No degree-granting authority from the CB & no accreditation from a CB recognized accreditor. Claims to be branch campus of the fraudulent Wamborough University.
Advanced Education Trust		No accreditation from a CB recognized accreditor.
Advanced Learning Network	Vermont	No accreditation from a CB recognized accreditor.

IOND University	Hawaii; Japan; Philippines	No accreditation from a CB recognized accreditor. AKA Diamond Head University. AKA Hawaii IOND University. Its website misleadingly claims the institution is "identical to U.S. Harvard University, the oldest university in America," a claim related only to its tax exempt status and not to educational quality. Claims to be approved by the Philippines, though that appears to consist of a claim of affiliation with some Philippine universities, which does not constitute approval to operate. Oregon reports the University of Lotz, Poland, denies it has an affiliation with this entity as claimed by IOND.
Irish International University	Malaysia; Cambodia; Kenya; United Kingdom; Switzerland; Seborga; Ireland	The Irish government has requested that Malaysia close this entity on grounds that it is neither Irish nor a university. Claims to be located in Ireland but has no degree-granting authority from Ireland. Claims to be accredited by the Old Principality of Seborga, which has not demonstrated it has authority to issue degree-granting. Oregon reports that this entity has received a business license from a Swiss canton, which does not denote approval of the entity as a provider of degrees in Switzerland. Also offers degrees from sites in Cambodia, Kenya, and the United Kingdom.
Irish University Business School	Ireland	No degree-granting authority from Ireland.
James Cook Medical School	San Antonio, Texas; Cook Islands	No degree-granting authority from the CB & no accreditation from a CB recognized accreditor. Approved by the Cook Islands in 1999, but approval was removed in 2004.
James Monroe University	Liberia, operated from Washington, Idaho and Arizona.	Fictitious name used by the St. Regis University scam. See St. Regis University.
John Thomas	Missouri	No accreditation from a CB recognized accreditor.
Kalinga University	India	No degree-granting authority in India. Not to be confused with the legitimate Kalinga of the Philippines.
Kennedy-Western University	California; Wyoming	No accreditation from a CB recognized accreditor. Name changing to Warren National University.
Kensington University	Hawaii, California	No accreditation from a CB recognized accreditor. Closed by court order.
Kent College	Louisiana	No accreditation from a CB recognized accreditor.
Kingdom College of Natural Health	Louisiana; Wyoming; Guam; Russia	No accreditation from a CB recognized accreditor.
Kingsfield University		Fictitious name used by the University Degree Program scam. See University Degree Program (1).
Knightsbridge University	Denmark	No degree-granting authority in Denmark.
LaCrosse University	Mississippi; Louisiana	No accreditation from a CB recognized accreditor. Closed by LA Board of Regents for failure to gain accreditation. Moved to MS. MS Commission on College Accreditation reports the institution is a "non-approved" entity.
Lamherhurst University	United Kingdom	No degree-granting authority from the United



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Accreditation in the United States is a voluntary, nongovernmental process, in which an institution and its programs are evaluated against standards for measuring quality.

ACCREDITING AGENCIES RECOGNIZED BY THE U.S. DEPARTMENT OF EDUCATION

The Secretary of the U.S. Department of Education recognizes select accrediting agencies as reliable authorities regarding the quality of education or training offered by the institutions or programs they accredit. Accreditation by a recognized accrediting agency is part of the requirements for institutions to participate in federal student aid programs. **The Secretary and the Department are not responsible for accrediting institutions of higher education.** Accrediting agencies accredit institutions, colleges, universities, and programs.

Note: The U.S. Department of Education does not have the authority to accredit private or public elementary or secondary schools, and the Department does not recognize accrediting bodies for the accreditation of private or public elementary and secondary schools. However, the U.S. Department of Education does recognize accrediting bodies for the accreditation of institutions of higher (postsecondary) education. If an accrediting body which is recognized by the Department for higher education also accredits elementary and secondary schools, the Department's recognition applies only to the agency's accreditation of postsecondary institutions.

Important: Accrediting agencies may voluntarily seek recognition from the Secretary only if the schools and institutions the agency accredits need the Secretary's recognition in order to participate in some federal program, such as the federal student financial aid programs.

Accrediting agencies recognized by the Secretary meet certain criteria, the institutions accredited by those agencies meet standards that address the quality of an institution and its programs. An accrediting agency that meets the Department's criteria for recognition is determined to be a reliable authority in measuring the quality of education or training provided by the institutions it accredits in the United States and its territories. Agencies that meet these criteria are placed on the Department's [List of Nationally Recognized Accrediting Agencies](#).

UNRECOGNIZED ACCREDITING AGENCIES

Unrecognized accrediting agencies have not had their accreditation standards reviewed by the U.S. Department of Education. There are a variety of reasons why an agency is unrecognized, some agencies may be working towards recognition with the Secretary and others may not meet the criteria for recognition.

An unrecognized accrediting agency should be viewed with caution until its reputation can be determined. Although these accrediting agencies are unrecognized, it does not mean that they do not have high standards of quality. Likewise, because the Secretary does not recognize an accrediting agency does not mean that the institutions accredited by that agency do not provide a quality education.

Remember: Many employers in the United States only recognize degrees earned from institutions accredited by an accrediting agency recognized by the Secretary of Education. The federal government's Office of Personnel Management (OPM) has been involved with keeping diploma mill degrees from the federal workplace. "OPM has provided ongoing guidance to federal departments and agencies... making it clear that so-called 'degrees' from diploma mills will not be accepted for purposes of qualifying for federal positions, for student loan repayment, and for purposes of paying for employees to obtain college degrees."

Any institution can claim to be accredited. It is important that you, as a consumer, do your homework. For more information about recognized and unrecognized accrediting agencies, as well fraud, waste, and abuse related to

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ACCREDITED INSTITUTIONS

Accredited institutions have agreed to have their institution and its programs reviewed to determine the quality of education and training being provided. If an institution is accredited by a recognized agency, its teachers, coursework, and facilities, equipment, and supplies are reviewed on a routine basis to ensure students receive a quality education and get what they pay for. Attending an accredited institution is often a requirement for employment and can be helpful later on if you want to transfer academic credits to another institution.

UNACCREDITED INSTITUTIONS

Unaccredited institutions are not reviewed against a set of standards to determine the quality of their education and training. This does not necessarily mean that an unaccredited institution is of poor quality, but earning a degree from an unaccredited institution may create problems for students. Some employers, institutions, and licensing boards only recognize degrees earned from institutions accredited by an accrediting agency recognized by the U.S. Department of Education. With this in mind, it is recommended that students check with other institutions regarding the transfer of credit policy to determine if that institution would accept the degree and/or credits earned from any institution they plan to enroll in.

Remember: In some states, it can be illegal to use a degree from an institution that is not accredited by a nationally recognized accrediting agency, unless approved by the state licensing agency.



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